

# **EXHIBIT 59**

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ORACLE USA, INC., a )  
Colorado corporation; )  
ORACLE AMERICA, INC., a )  
Delaware Corporation, and )  
ORACLE INTERNATIONAL )  
CORPORATION, a California )  
corporation, )

Plaintiffs, )

vs. )

No. 2:10-CV-0106

LRH-PAL

RIMINI STREET, INC., a )  
Nevada corporation; SETH )  
RAVIN, an individual, )

Defendants. )

HIGHLY CONFIDENTIAL

VIDEOTAPED DEPOSITION OF SUSAN TAHTARAS

SAN FRANCISCO, CALIFORNIA

WEDNESDAY, APRIL 27, 2011

REPORTED BY: KATHERINE E. LAUSTER, RPR, CRR, CLR,

CSR 1894

FILE NO.: 10431

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1 SAN FRANCISCO, CALIFORNIA; WEDNESDAY, APRIL 27, 2011  
2 9:08 A.M. - 5:31 P.M.

3 ---

4 THE VIDEOGRAPHER: Good morning. My name  
5 is Adam Del Rio, your videographer. I represent  
6 Affinity Court Reporters, Incorporated in Burbank,  
7 California.

8 The date is April 27th, 2011, and the time  
9 is 9:08 a.m.

10 This deposition is taking place at Three  
11 Embarcadero Center, on the 28th Floor, in the City  
12 of San Francisco, California.

13 This case number is: 2-10-CV-0106  
14 LRH-PAL, entitled Oracle USA, Incorporated, et al.,  
15 versus Rimini Street, Incorporated, et al.

16 The deponent today is Susan Tahtaras.

17 The court reporter is Katherine Lauster  
18 with Affinity Court Reporters, Incorporated.

19 At this time will Counsel and all present  
20 identify themselves for the record, beginning with  
21 the questioning attorney, please.

22 MR. POLITO: John Polito from Bingham  
23 McCutchen for Oracle.

24 MR. MEYER: Darien Meyer, Boies Schiller &  
25 Flexner, for Oracle.

1 Q. My name is John Polito, we met just before  
2 your deposition, and I'm here on behalf of Oracle,  
3 the plaintiffs in this matter.

4 You just took an oath, and though we're  
5 here in an informal setting in a nice conference  
6 room, that oath has the same force and effect as if  
7 you had taken it in a court of law. Do you  
8 understand that?

9 A. I do.

10 Q. I'm sure that you are -- you were well  
11 prepared by your counsel, but just to review a few  
12 rules, the court reporter is taking down your  
13 audible, verbal responses, so please verbalize. If  
14 you nod your head, that's not going to show up on  
15 the record.

16 A. Right.

17 Q. There's a transcript that's being made of  
18 this deposition, and you're going to have an  
19 opportunity to review and change that transcript.  
20 Do you understand that?

21 A. Yes.

22 Q. And -- but if you make changes, anyone,  
23 either party has the ability -- ability to comment  
24 on those changes at trial. So do you understand --

25 A. Okay.

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1 MR. HOWARD: Geoff Howard from Bingham  
2 McCutchen for Oracle.

3 MR. PICKETT: Christopher Pickett, Rimini  
4 Street.

5 MR. DYKAL: Ryan Dykal, Shook, Hardy &  
6 Bacon, for Rimini Street.

7 MR. RECKERS: Rob Reckers, Shook, Hardy &  
8 Bacon, for the defendants.

9 THE VIDEOGRAPHER: Thank you.  
10 Will the court reporter please administer  
11 the oath, and we may proceed.

12 THE REPORTER: Will you raise your right  
13 hand, please.

14 Do you solemnly state, under penalty of  
15 perjury, the testimony you are about to give will be  
16 the truth, the whole truth, and -- and nothing but  
17 the truth?

18 THE WITNESS: I do.

19 SUSAN TAHTARAS,  
20 being first duly sworn,  
21 was examined and testified on her oath as follows:

22 EXAMINATION

23 BY MR. POLITO:

24 Q. Good morning, Ms. Tahtaras.

25 A. Good morning.

1 Q. -- that?

2 A. Yes.

3 Q. Great.

4 I ask, if you don't understand a question,  
5 please speak up and let me know. And I apologize in  
6 advance. I'm having allergy problems this morning.

7 A. Okay.

8 Q. So I will do my best to be audible.

9 We have to speak one at a time, because  
10 there is a transcript being taken, so please don't  
11 answer on top of a question.

12 Do you have any condition, whether  
13 physical or mental, that would interfere with your  
14 ability to give your best testimony today?

15 A. No.

16 Q. What did you do to prepare for your  
17 deposition today?

18 A. Just met with the attorneys, had  
19 discussions.

20 Q. For approximately how long?

21 A. Yesterday and various phone conversations.

22 Q. All day yesterday?

23 A. Yes.

24 Q. And how many phone conversations?

25 A. Two that I can recall. Yeah. Two.

3 (Pages 6 to 9)

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1 A. I think I have an idea.

2 Q. Do you -- if I asked if you've seen any  
3 discovery responses, do you know what a discovery  
4 response is?

5 A. No.

6 Q. Do you -- how about legal documents  
7 generally, that look like they were maybe filed by  
8 the court or look very official?

9 A. I've seen legal documents before.

10 Q. Okay. Have you seen any for this case  
11 specifically?

12 A. No.

13 Q. Did you bring any documents with you today  
14 to your deposition?

15 A. No.

16 Q. Did you bring anything else that might  
17 help you to answer my questions today?

18 A. No.

19 Q. Great. Thank you.

20 A. Uh-huh.

21

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## 1 REPORTER'S CERTIFICATE

2  
3 I, Katherine E. Lauster, CRR, CSR 1894, do  
4 hereby certify:  
5

6 That the foregoing deposition of SUSAN TAHTARAS  
7 was taken before me at the time and place therein  
8 set forth; at which time the witness was placed  
9 under oath and was by me sworn to tell the truth,  
10 the whole truth, and nothing but the truth;  
11

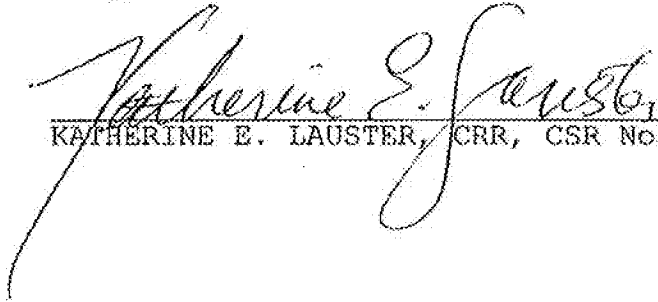
12 That the testimony of the witness and all  
13 objections made by counsel at the time of the  
14 examination were recorded stenographically by me,  
15 and were thereafter transcribed under my direction  
16 and supervision, and that the foregoing pages  
17 contain a full, true and accurate record of all  
18 proceedings and testimony to the best of my skill  
19 and ability.  
20

21 I further certify that I am neither related to  
22 counsel for any party to said action, nor am I  
23 related to any party to said action, nor am I in any  
24 way interested in the outcome thereof.  
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IN WITNESS WHEREOF, I have subscribed my name this

And day of May, 2011.

  
KATHERINE E. LAUSTER, CRR, CSR No. 1894



I, Susan Tahtaras, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted above.

Date: 5/16/2011

Susan Tahtaras

Susan Tahtaras